

RHODIA INC

CHIPMAN DIVISION

6200 N.W. ST. HELENS ROAD, PORTLAND, OREGON 97210 • PHONE (503) 222-3571

R-12

PASSF
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6/28/73

June 28, 1973

cc: Mr. James W. Moon
Mr. W. E. Evans
Mr. L. M. Minsuk

Mr. Art Losey
Department of Agriculture
State of Washington
406 General Administration Building
Olympia, WA 98504

USEPA SF



1371122

Dear Art:

Confirming our conversation of Tuesday, June 26, we have shipped a total of 5411 drums of waste chemicals through Resource Recovery Corp. The total drums are as follows:

	<u>1972</u>	<u>1973</u>	<u>Total</u>
2,4-D Tar	571	1440	2011
MCPA Bleed	384	2581	2965
Other	<u>74</u>	<u>361</u>	<u>435</u>
TOTALS	1029	4382	5411

The shipments started to RRC on December 11, 1972 with the first thousand drums being a backlog of waste material on the plant site. Recent shipments have included the current manufacture of material and most of the other chemicals.

The composition of the various waste streams are as follows:

2,4-D Tar: Trichlorophenol, 15 - 20%, dichlorophenol (2,4 and 2,6 isomer) 5 - 10%, phenolic type resins, 70 - 80% to total 100%. The tar is a 100% organic stream that is generated from a distillation process on the dichlorophenol. The tar is anhydrous and in the acid condition. Vapor pressure of this material should be very low because the boiling point of this material is 180°C at 760 mm pressure. This vapor pressure extrapolates on a Cox Chart to < 1 mm at ambient temperature.



Mr. Art Losey, Olympia WA
6-28-73
Page two

MCPA Tar:

<u>Compound</u>	<u>Ave. %</u>	<u>Range</u>
4 Cl MCPA	10	6 - 17
6 Cl MCPA	9	6 - 12
Chlorocresols	10.	4 - 20
Spirolactone	22	18 - 24
Free Caustic	Approx. 10	
Moisture	<u>26</u>	24 - 28
	100%	

Spirolactone will break down to dichlorocresol and glycolic acid and evolution of HCl. The cresols and MCPA compounds are, of course, sodium salt. pH in the range of 10. There were a few drums of acid non-neutralized MCPA Bleed produced numbering approximately 40 drums. These are included in the above numbers. Other compounds are as follows:

	<u>No.</u>	<u>Composition</u>
A. Lab Samples	20	Everything made--retains, etc.
B. Filter Aid	110	Dicalite, 2,4-D Esters @ 2-4% by weight.
C. Pit Cleanings		
MCPA	20	Inorganic salts, cresol-MCPA
2,4-D	20	Inorganic salts, DCP-2,4-D
D. Water System Cleanings	30	Carbon, solvents 20%. Esters 2,4-D-MCPA, etc.
E. Water System Cleanings	14	Chlorinated phenols and salts.
F. Ground Cleanings	10	Alcohol-Esters and H2O
	16	Phenol and dirt.
	40	Carbon and rock.

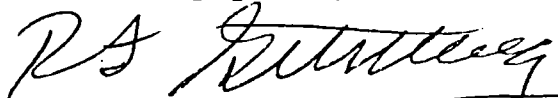
Mr. Art Losey, Olympia WA
6-28-73
Page three

Others (continued)

	<u>No.</u>	<u>Composition</u>
G. Floor Sweepings	85	2,4-D & MCPA Acid, wood, gravel, etc.
H. Filter Seal Tank	30	10% 2,4-D sodium salt, plus inorganic salts.
I. Filter cartridges	10	2,4-DB, MCPA, Esters @ 1% wt.
J. Ester Pit cleanings	10	10% 2,4-D salts and alcohol
K. Tank Farm Sump	20	Solvents-alcohol and 2,4-D esters and H ₂ O.

435

Very truly yours,



R. F. Gitschlag, Plant Manager
CHIPMAN DIVISION OF RHODIA INC.

RFG:bjf